

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Pilot Travel Centers LLC,

Plaintiff,

v.

BarGib Enterprises, Inc.,

Defendant.

Civil Action No. 2:19-cv-00710-DCN

(23488.1 SMF)

**ANSWERS TO LOCAL CIVIL RULE 26.01 INTERROGATORIES OF  
PLAINTIFF PILOT TRAVEL CENTERS LLC**

Pursuant to Local Civil Rule 26.01 DSC, Plaintiff Pilot Travel Centers LLC answers the Court's Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**Answer: None.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**Answer: Non-jury because both parties waived their right to a jury trial in § 30(l) of the Sublease Agreement that is the subject of this action.**

(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) each publicly-owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly-owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly-owned company in which the party owns ten percent or more of the outstanding shares.

**Answer: Plaintiff is not a publicly-owned company and is not a parent, subsidiary, partner, or affiliate of any publicly-owned company. No publicly-owned company owns ten percent or more of the outstanding shares or other indicia of ownership of Plaintiff. Plaintiff does not own ten percent or more of the outstanding shares of any public-held company.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**Answer: This is an action for breach of a sublease of real property located in Berkeley County and Defendant resides and does business relating to the events alleged in the Complaint in this Division.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**Answer: No other related matters are known to be pending in this District.**

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**Answer: Not applicable to Plaintiff.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**Answer: Not applicable to Plaintiff.**

Respectfully submitted,

s/ Sean M. Foerster

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March 11, 2019